

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS, Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX, Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	Facility ID No. 9993
)	
Permittee of FM Station KYAF, Firebaugh, California)	
)	
H. L. CHARLES D/B/A FORD CITY BROADCASTING)	Facility ID No. 22030
)	
Permittee of FM Station KZPE, Ford City, California)	
)	
LINDA WARE D/B/A LINDSAY BROADCASTING)	Facility ID No. 37725
)	
Licensee of FM Station KZPO, Lindsay, California)	

To: Marlene H. Dortch, Secretary
Attn: Chief Administrative Law Judge Richard L. Sippel

ENFORCEMENT BUREAU'S MOTION TO COMPEL AVENAL EDUCATIONAL SERVICES, INC. AND CENTRAL VALLEY EDUCATIONAL SERVICES, INC. TO PROVIDE COMPLETE RESPONSES TO OUTSTANDING DISCOVERY REQUESTS

1. On June 4, 2015, the Presiding Judge directed the parties to commence discovery on all issues set forth in the Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing (*Order*).¹ In compliance with that *Order*, the Enforcement Bureau (Bureau) served its first set of interrogatories on Avenal Educational Services, Inc. (Avenal) and Central Valley Educational Services, Inc. (Central Valley) on July 28, 2015² and its first set of document requests on July 29, 2015.³

2. Mr. Zawila served a joint response to the Bureau's document requests on behalf of Avenal and Central Valley, which contains nothing but baseless general objections and no substantive responses.⁴ Mr. Zawila also served an untimely joint response to the Bureau's interrogatories on behalf of Avenal and Central Valley, which likewise objects to providing any substantive responses.⁵ In addition, Mr. Michael Couzens, who also claims to represent Avenal and Central Valley (and disputes that Mr. Zawila represents these parties), filed a separate

¹ See *Order*, FCC 15M-21 (ALJ, rel. June 4, 2015), at 2.

² See Enforcement Bureau's First Set of Interrogatories to Avenal Educational Services, Inc., served Jul. 28, 2015, attached hereto as Exhibit A; Enforcement Bureau's First Set of Interrogatories to Central Valley Educational Services, Inc., served Jul. 29, 2015, attached hereto as Exhibit B.

³ See Enforcement Bureau's First Set of Requests for Production of Documents to Avenal Educational Services, Inc., served Jul. 29, 2015, attached hereto as Exhibit C; Enforcement Bureau's First Set of Requests for Production to Central Valley Educational Services, Inc., served Jul. 29, 2015, attached hereto as Exhibit D.

⁴ See Joint Response to Enforcement Bureau's First Set of Requests for Production of Documents to Avenal Educational Services, Inc. and Central Valley Educational Services, Inc., served Aug. 11, 2015, attached hereto as Exhibit E (Zawila Joint Document Response).

⁵ See Joint Response to Enforcement Bureau's First Set of Interrogatories to Avenal Educational Services, Inc. and Central Valley Educational Services, Inc., served Aug. 14, 2015, attached hereto as Exhibit F (Zawila Joint Interrogatory Response). See 47 C.F.R. § 1.323(b) ("The parties upon whom the interrogatories were served shall serve a copy of the answers and objections...within 14 days after service of the interrogatories...."). Avenal's and Central Valley's interrogatory responses were due on August 12, 2015.

document entitled “General Objection to Request for Production of Documents.”⁶ Mr. Couzens’ response similarly fails to provide a single substantive response to the Bureau’s document requests, consists of almost entirely general objections, and appears to suggest (in the midst of a series of personal attacks against Bureau counsel) that Mr. Couzens will not be serving any responses to the Bureau’s interrogatories on behalf of Avenal and Central Valley.⁷

3. Taking both sets of objections together, in essence, Avenal and Central Valley object to the Bureau’s discovery requests in their entirety – and refuse to provide *any* of the requested documents or information – on the grounds that the Bureau directed its requests to each of the attorneys claiming to represent Avenal and Central Valley and that the requests themselves “do not reveal on their face which attorney and group of clients is expected to be the responding parties.”⁸ It is plain from the face of the Bureau’s discovery requests that the Bureau directed its interrogatories and discovery requests to the parties – Avenal and Central Valley. The fact that two different attorneys may be claiming to represent two different entities calling themselves Avenal and Central Valley does not absolve either from responding to the Bureau’s discovery requests. Indeed, as is clear from the attorneys’ earlier filings on ownership of Avenal and Central Valley, both Mr. Zawila and Mr. Couzens claim to be representing entities who claim to be the respective permittees of Stations KAAX (FM) and KYAF (FM) named as a parties in the above-captioned matter. As such, each such set of entities is obligated to participate in this proceeding and to respond to the Bureau’s discovery requests.

⁶ See General Objection to Request for Production of Documents, served Aug. 11, 2015, attached hereto as Exhibit G (Couzens General Objection). The Bureau notes that Mr. Couzens served this document by mail but did not serve a courtesy copy via email. The Bureau requests that the Presiding Judge instruct Mr. Couzens to do so in the future.

⁷ To date, the Bureau has not received any responses to the Bureau’s interrogatories from Mr. Couzens on behalf of Avenal and Central Valley.

⁸ See Zawila Joint Document Response at 2; Zawila Joint Interrogatory Response at 2. See also Couzens General Objection at 2.

4. Moreover, both Mr. Zawila's Joint Responses and Mr. Couzens' General Objections rely almost exclusively on perfunctory objections rather than articulating objections to specific documents requests or interrogatories. It is well-established that general objections, alone, are insufficient to substantiate a refusal to provide the requested discovery.⁹

5. In addition, Mr. Zawila, on behalf of Avenal and Central Valley, also generally objects that the Bureau's discovery requests in their entirety seek irrelevant information, and are burdensome, oppressive, and cause unnecessary expense.¹⁰ Since Avenal and Central Valley fail to identify any specific request or interrogatory to which they direct these objections, or to explain the basis therefor, none of these objections provide a justification for refusing to respond to the Bureau's requests.

6. Lastly, Mr. Couzens, on behalf of Avenal and Central Valley, further objects to the Bureau's discovery requests on the grounds that Avenal and Central Valley should not have to incur the full expense of responding to these requests without knowing how the Presiding Judge will rule on the Bureau's pending motion to enlarge issues in this proceeding.¹¹ As Mr. Couzens notes, he originally requested that the Bureau toll Avenal and Central Valley's

⁹ In Mr. Couzens' General Objection, he suggests that four of the Bureau's document requests seek information that is already part of the Commission's records. *See* Couzens General Objection at 2. The Bureau's Request Nos. 1-3 seek Avenal and Central Valley's application for their respective construction permits, the permits themselves, and the application for a license to cover these permits. *See* Exhibits A and B at Request Nos. 1-3. Regardless of whether these documents may be in the Commission's files, there is an issue presented in the HDO as to whether these permittees maintained proper public inspection files in compliance with Section 73.3526 of the Commission's rules. *See, e.g.*, HDO at ¶ 113(d). The documents requested fall within the definition of such public inspection files. *See* 47 C.F.R. § 73.3526(e). Mr. Couzens' objection would turn the Commission's public inspection file requirements on their head, and would discharge licensees from the requirement to themselves maintain, and produce upon request, such files. With regard to the Bureau's requests for Avenal and Central Valley's FCC Forms 854 certifying completion of construction of their stations (*see* Exhibit C and D at Request No. 4), the HDO plainly suggests these documents were never filed with the Commission. *See, e.g.*, HDO at ¶¶ 24, 33. For Avenal and Central Valley to refuse to produce the documents and instead to direct the Bureau to the Commission's files is patently evasive.

¹⁰ *See* Zawila Joint Document Response at 3; Zawila Joint Interrogatory Response at 3.

¹¹ *See* Couzens General Objection at 2-3.

obligation to respond to the Bureau's first set of interrogatories on these same grounds.¹²

Although the Bureau agreed to toll Avenal's obligations to respond to certain interrogatories which, arguably seek discovery concerning the two issues the Bureau has requested be added to the proceeding,¹³ there is no basis for Avenal and Central Valley to refuse to respond to discovery directed to the already-existing issues designated for hearing in the HDO. Avenal and Central Valley are named parties to this proceeding, and as such, have obligations pursuant to the Commission's rules.

Conclusion

7. For the reasons stated above, the Bureau respectfully requests that the Presiding Judge issue an order compelling Avenal and Central Valley, whether represented by Mr. Zawila or by Mr. Couzens, to serve comprehensive responses to the Bureau's first set of interrogatories and first set of document requests within 14 days.

¹² See email dated Jul. 28, 2015 from Mr. Couzens to counsel for the Bureau, attached hereto as Exhibit H.

¹³ See email dated Jul. 29, 2015 from counsel for the Bureau to Mr. Couzens, attached hereto as Exhibit I.

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



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August 21, 2015

CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 21st day of August, 2015, sent copies of the foregoing "ENFORCEMENT BUREAU'S MOTION TO COMPEL AVENAL EDUCATIONAL SERVICES, INC. AND CENTRAL VALLEY EDUCATIONAL SERVICES, INC. TO PROVIDE COMPLETE RESPONSES TO OUTSTANDING DISCOVERY REQUESTS to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804-4833
(714) 636-5040 (telephone)
& (714) 636-5042 (facsimile)
(by facsimile and first-class mail)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)


Alicia McCannon

Exhibit A

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS,)	
Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES,)	Facility ID No. 3365
INC.)	
)	
Permittee of FM Station KAAX,)	
Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL)	Facility ID No. 9993
SERVICES, INC.)	
)	
Permittee of FM Station KYAF,)	
Firebaugh, California)	
)	
H. L. CHARLES D/B/A FORD CITY)	Facility ID No. 22030
BROADCASTING)	
)	
Permittee of FM Station KZPE,)	
Ford City, California)	
)	
LINDA WARE D/B/A LINDSAY)	Facility ID No. 37725
BROADCASTING)	
)	
Licensee of FM Station KZPO,)	
Lindsay, California)	

To: Avenal Educational Services, Inc.

**ENFORCEMENT BUREAU'S FIRST SET OF INTERROGATORIES
TO AVENAL EDUCATIONAL SERVICES, INC.**

1. Pursuant to Section 1.323 of the Commission's rules, 47 C.F.R. § 1.323, the Enforcement Bureau (Bureau) hereby submits the following Interrogatories to Avenal Educational Services, Inc. (Avenal).

2. Avenal shall deliver its responses to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, D.C. 20554 (or at some other location that is mutually acceptable to the Bureau and Avenal) within 14 days of the date of these interrogatories.

3. The obligation of Avenal to answer these interrogatories is continuing in nature. Avenal has an obligation to provide in the future any and all additional responsive information that may come to its attention subsequent to its answering these interrogatories but not initially disclosed at the time, date and place set forth herein or in any supplemental answers that it submits. In this regard, Avenal must supplement its initial and supplemental responses if it learns that, in some material respect, the responses initially provided, or as supplemented, were incomplete or incorrect or if additional responsive information is acquired by or has become known after its initial or supplemental responses.

DEFINITIONS

For the purposes of this document, the following definition shall apply:

a. "Avenal" "you" and "your" shall mean Avenal Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and

successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

b. "William L. Zawila" and "Mr. Zawila" shall mean William L. Zawila.

c. "Central Valley" shall mean Central Valley Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

d. "FCB" shall refer to The Estate of H.L. Charles d/b/a/ Ford City Broadcasting, H.L. Charles d/b/a/ Ford City Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

e. "Lindsay Broadcasting" shall refer to The Estate of Linda Ware d/b/a Lindsay Broadcasting, Linda Ware d/b/a Lindsay Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

- f. "EAS" shall mean Emergency Alert System.
- g. "KNGS" means radio broadcast station KNGS (FM), Coalinga, California.
- h. "KAAX" means radio broadcast station KAAX (FM), Avenal, California.
- i. "KYAF" means radio broadcast station formerly known under call sign KAJF (FM), Firebaugh, California."
- j. "KZPE" means radio broadcast station LZPE (FM), Ford City, California.
- k. "KZPO" means radio broadcast station KZPO (FM), Lindsay, California.
- l. "Act" shall mean the Communications Act of 1934, as amended.
- m. "Commission" or "FCC" shall mean the Federal Communications Commission.
- n. "WTB" shall mean the Wireless Telecommunications Bureau of the Commission.
- o. "Audio Division" shall mean the Audio Division of the Commission's Media Bureau.
- p. "HDO" shall refer to the Order to Show Cause, Notice of Opportunity for Hearing, and Hearing Designation Order, released by the Commission on July 16, 2003 in EB Docket No. 03-152.
- q. "FCC Form 854" shall mean the FCC Form 854 used to register structures used for wire or radio communication service in any area where radio services are regulated by the Commission; to make changes to existing registered structures or pending applications; or to notify the Commission of the completion of construction or dismantlement of structures, as required by Title 47 of the Code of Federal Regulations, Chapter 1, Part 17 (FCC Rules Part 17) which can be located at <https://transition.fcc.gov/Forms/Form854/854.pdf>.
- r. "Public Inspection Files" shall mean those files identified in Section 73.3526 of the Commission's Rules.

s. "Rules" means the Commission's regulations found in Title 47 of the Code of Federal Regulations.

t. The terms/phrases "referring to," "relating to" and/or "concerning," as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

u. "State" and "describe" mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

v. The terms "identify" and "identification" when used in reference to an individual person mean to state his full name, last known residence and business telephone numbers, last known residence and business addresses, and his present or last known title, position and business affiliation.

w. The terms "identify" and "identification" when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

x. The terms "identify" and "identification" when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known

location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

y. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

z. The term “and” also means “or” and the term “or” also means “and.”

aa. The term “each” also means “every” and the term “every” also means “each.”

bb. The term “all” also means “any” and the term “any” also means “all.”

cc. The term “document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as

will transform such computer materials into easily understandable form) in the possession, custody, or control of Avenal.

dd. "Discussion" means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. "Discussion" includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ee. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. In the event you are unable to respond to any Interrogatory, please explain why you are unable to respond.

d. Unless otherwise specified, supply all information requested for the period January 1, 1987 through the present.

INTERROGATORIES

1. Describe all efforts that were taken to construct the facilities at KNGS, including but not limited to, all discussions that were had with Robert F. Turner about building out the KNGS facilities.

2. Describe all efforts that were taken to construct the facilities at KAAX, including but not limited to, all discussions that were had with Robert F. Turner about building out the KAAX facilities.

3. Explain whether Avenal filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KNGS, and if not, explain why not.

4. Explain whether Avenal filed an FCC Form 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KAAX, and if not, explain why not.

5. Describe the facilities that currently exist at KNGS, including but not limited to, the antenna structure and whether there exists a staffed main studio.

6. If there was a point in time in which KNGS did not maintain a staffed main

studio, identify the time period(s) and explain why no such staffed main studio was maintained.

7. Identify all of the locations where KNGS has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

8. Identify any time period(s) in which KNGS did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KNGS did not maintain its Public Inspection Files.

9. Identify any time period(s) in which KAAX did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KAAX did not maintain its Public Inspection Files.

10. Identify the height and location of the antenna structure for KNGS since obtaining the construction permit and at all times thereafter.

11. Explain whether the tower for the KNGS antenna was dismantled, including but not limited to the reason or reasons such tower was dismantled and the date on which it was dismantled.

12. If the KNGS antenna was dismantled, explain whether it was ever reassembled, and if so the date on which that occurred.

13. Explain whether the tower for the KAAX antenna was dismantled, including but not limited to the reason or reasons such tower was dismantled and the date on which it was dismantled.

14. If the KAAX antenna was dismantled, explain whether it was ever reassembled, and if so the date on which that occurred.

15. Describe the facilities that currently exist at KAAX, including but not limited to,

the antenna structure and whether there exists a staffed main studio.

16. If there was a point in time in which KAAX did not maintain a staffed main studio, identify the time period(s) and explain why no such staffed main studio was maintained.

17. Identify all of the locations where KAAX has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

18. Identify the height and location of the antenna structure for KAAX since obtaining the construction permit and at all times thereafter.

19. Identify the local number in Coalinga, California or the toll-free number for KNGS that has been associated with this station since obtaining the construction permit.

20. Identify the local number in Avenal, California or the toll-free number for KAAX that has been associated with this station since obtaining the construction permit.

21. Describe whether Avenal was given permission or was provided with authorization to operate KNGS on land owned by the Bureau of Land Management of the U.S. Department of Interior, and if so, identify (a) the date on which Avenal was given such permission or provided such authorization, (b) the type of permission or authorization (e.g., rental, right-of-way); (c) the person or persons from whom Avenal obtained this permission or authorization and their contact information; (d) the term of this permission or authorization.

22. Identify the date on which construction of the facilities at KNGS in accordance with the construction permit was completed.

23. Identify the date on which construction of the facilities at KAAX in accordance with the construction permit was completed.

24. Explain whether KNGS was constructed in compliance with its construction

permit, and if not, explain why it was not.

25. Explain whether KAAX was constructed in compliance with its construction permit, and if not, explain why it was not.

26. Describe the vandalism that purportedly occurred in relation to the KNGS tower, including but not limited to the date(s) on which this purported vandalism occurred.

27. Describe the vandalism that purportedly occurred in relation to the KAAX tower, including but not limited to the date(s) on which this purported vandalism occurred.

28. Explain whether the KNGS tower was ever reconstructed after the purported vandalism, and if not, explain why not.

29. Explain whether the KAAX tower was ever reconstructed after the purported vandalism, and if not, explain why not.

30. Describe the involvement if any of Michael Kunec in constructing the KNGS facilities.

31. Describe the involvement if any of Michael Kunec in constructing the KAAX facilities.

32. Explain whether Mr. Zawila was an owner, officer, or individual who controlled the operations of Avenal at the time a construction permit for KAAX was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

33. Identify the role and responsibilities of Michael McKenna in Avenal at the time Avenal filed for a construction permit for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

34. Identify the role and responsibilities of George Sullivan in Avenal at the time Avenal filed for a construction permit for KAAX, during the time periods referenced in the

HDO, and at all times thereafter.

35. Explain why George Sullivan signed the application for the construction permit for KAAX.

36. Explain why Mr. Zawila signed the application for a license to cover the construction permit for KAAX.

37. Explain why Mr. Zawila signed the application for a license to cover the construction permit for KNGS.

38. Explain why Michael McKenna signed the modification application for KNGS.

39. Explain whether Mr. Zawila was authorized to act for, or otherwise represent or act as counsel for, Avenal related to KAAX at the time Avenal filed for a construction permit for KAAX, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

40. Explain whether Mr. Zawila was an owner, officer, or individual who controlled the operations of Avenal at the time a construction permit for KNGS was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

41. Explain whether Mr. Zawila was authorized to act for, or otherwise represent or act as counsel for, Avenal related to KNGS at the time a construction permit for KNGS was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

42. Identify all consultants, contractors, agents or other parties whom Avenal hired to assist with, provide advice, administer, or complete construction of KNGS, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

43. Identify all consultants, contractors, agents or other parties whom Avenal hired to assist with, provide advice, administer, or complete construction of KAAX, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

44. Explain whether KNGS is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

45. Explain whether KAAX is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

46. Identify the state in which Avenal was incorporated and the date on which it was incorporated.

47. Identify all individuals who assisted in the preparation of your responses to the Enforcement Bureau's First Set Of Requests For Production Of Documents to Avenal Educational Services, Inc., and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.

48. Identify all individuals who assisted in the preparation of your responses to the Enforcement Bureau's First Set Of Interrogatories To Avenal Educational Services, Inc., and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.

49. Identify each and every person that Avenal expects to rely on as a witness and/or for whom Avenal intends to submit written direct testimony for the hearing. For each and every person identified, state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



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Special Counsel
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Market Disputes Resolution Division
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July 28, 2015

CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 28th day of July, 2015, sent by first class United States mail copies of the foregoing "ENFORCEMENT BUREAU'S FIRST SET OF INTERROGATORIES TO AVENAL EDUCATIONAL SERVICES, INC" to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554 (by hand, courtesy copy)

Austin Randazzo
Office of the Administrative Law Judge
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804-4833
(714) 636-5040 (telephone)
(714) 636-5042 (facsimile)
(by facsimile and first-class mail)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)


Alicia McCannon

Exhibit B

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNGS,)	
Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX,)	
Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	Facility ID No. 9993
)	
Permittee of FM Station KYAF,)	
Firebaugh, California)	
)	
H. L. CHARLES D/B/A FORD CITY BROADCASTING)	Facility ID No. 22030
)	
Permittee of FM Station KZPE,)	
Ford City, California)	
)	
LINDA WARE D/B/A LINDSAY BROADCASTING)	Facility ID No. 37725
)	
Licensee of FM Station KZPO,)	
Lindsay, California)	

To: Central Valley Educational Services, Inc.

**ENFORCEMENT BUREAU'S FIRST SET OF INTERROGATORIES
TO CENTRAL VALLEY EDUCATIONAL SERVICES, INC.**

1. Pursuant to Section 1.323 of the Commission's rules, 47 C.F.R. § 1.323, the Enforcement Bureau (Bureau) hereby submits the following Interrogatories to Central Valley Educational Services, Inc. (Central Valley).

2. Central Valley shall deliver its responses to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, D.C. 20554 (or at some other location that is mutually acceptable to the Bureau and Central Valley) within 14 days of the date of these interrogatories.

3. The obligation of Central Valley to answer these interrogatories is continuing in nature. Central Valley has an obligation to provide in the future any and all additional responsive information that may come to its attention subsequent to its answering these interrogatories but not initially disclosed at the time, date and place set forth herein or in any supplemental answers that it submits. In this regard, Central Valley must supplement its initial and supplemental responses if it learns that, in some material respect, the responses initially provided, or as supplemented, were incomplete or incorrect or if additional responsive information is acquired by or has become known after its initial or supplemental responses.

DEFINITIONS

For the purposes of this document, the following definition shall apply:

a. "Central Valley" "you" and "your" shall mean Central Valley Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and

successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

b. "William L. Zawila" and "Mr. Zawila" shall mean William L. Zawila.

c. "Avenal" shall mean Avenal Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

d. "FCB" shall refer to The Estate of H.L. Charles d/b/a/ Ford City Broadcasting, H.L. Charles d/b/a/ Ford City Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

e. "Lindsay Broadcasting" shall refer to The Estate of Linda Ware d/b/a Lindsay Broadcasting, Linda Ware d/b/a Lindsay Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

- f. "EAS" shall mean Emergency Alert System.
- g. "KNGS" means radio broadcast station KNGS (FM), Coalinga, California.
- h. "KAAX" means radio broadcast station KAAX (FM), Avenal, California.
- i. "KYAF" means radio broadcast station formerly known under call sign KAJF (FM), Firebaugh, California."
- j. "KZPE" means radio broadcast station LZPE (FM), Ford City, California.
- k. "KZPO" means radio broadcast station KZPO (FM), Lindsay, California.
- l. "Act" shall mean the Communications Act of 1934, as amended.
- m. "Commission" or "FCC" shall mean the Federal Communications Commission.
- n. "WTB" shall mean the Wireless Telecommunications Bureau of the Commission.
- o. "Audio Division" shall mean the Audio Division of the Commission's Media Bureau.
- p. "HDO" shall refer to the Order to Show Cause, Notice of Opportunity for Hearing, and Hearing Designation Order, released by the Commission on July 16, 2003.
- q. "FCC Form 854" shall mean the FCC Form 854 used to register structures used for wire or radio communication service in any area where radio services are regulated by the Commission; to make changes to existing registered structures or pending applications; or to notify the Commission of the completion of construction or dismantlement of structures, as required by Title 47 of the Code of Federal Regulations, Chapter 1, Part 17 (FCC Rules Part 17) which can be located at <https://transition.fcc.gov/Forms/Form854/854.pdf>.
- r. "Public Inspection Files" shall mean those files identified in Section 73.3526 of the Commission's Rules.
- s. "Rules" means the Commission's regulations found in Title 47 of the Code of Federal Regulations.

t. The terms/phrases “referring to,” “relating to” and/or “concerning,” as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

u. “State” and “describe” mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

v. The terms “identify” and “identification” when used in reference to an individual person mean to state his full name, residence and business telephone numbers, and present residence and business addresses if known, and his present or last known title, position and business affiliation.

w. The terms “identify” and “identification” when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

x. The terms “identify” and “identification” when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

y. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion,

occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

z. The term “and” also means “or” and the term “or” also means “and.”

aa. The term “each” also means “every” and the term “every” also means “each.”

bb. The term “all” also means “any” and the term “any” also means “all.”

cc. The term “identify” when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

dd. The term “Document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as

will transform such computer materials into easily understandable form) in the possession, custody, or control of Central Valley.

ee. "Discussion" means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. "Discussion" includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ff. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

gg. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

hh. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

ii. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

jj. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. In the event you are unable to respond to any Interrogatory, please explain why you are unable to respond.

d. Unless otherwise specified, supply all information requested for the period January 1, 1988 through the present.

INTERROGATORIES

1. Describe all efforts that were taken to construct the facilities at KYAF.
2. Explain whether Central Valley filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KYAF, and if not, explain why not.
3. Explain whether the tower for the KYAF antenna was dismantled, including but not limited to the reason or reasons such tower was dismantled and the date on which it was dismantled.
4. If the KYAF antenna was dismantled, explain whether it was ever reassembled, and if so the date on which that occurred.
5. Identify all of the locations where KYAF has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.
6. Describe the facilities that currently exist at KYAF, including but not limited to, the antenna structure and whether there exists a staffed main studio.
7. If there was a point in time in which KYAF did not maintain a staffed main

studio, identify the time period(s) and explain why no such staffed main studio was maintained.

8. Identify the height and location of the antenna structure for KYAF since obtaining the construction permit for that station, and at all times thereafter.

9. Identify the local number in Firebaugh, California or the toll-free number for KYAF that has been associated with this station since obtaining the construction permit.

10. Identify the date on which construction of the facilities at KYAF in accordance with the construction permit was completed.

11. Identify the EAS equipment that has been maintained at the KYAF site since Central Valley obtained the construction permit.

12. Identify any time period(s) in which KYAF did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KYAF did not maintain its Public Inspection Files.

13. Identify any time period(s) in which KYAF has not maintained EAS equipment since obtaining its construction permit, and for each such time period, explain why KYAF did not maintain EAS equipment.

14. Identify the chief operator of KYAF.

15. Explain the connection of Mr. Ray Knight to KYAF.

16. Identify the contact information for Mr. Knight, including but not limited to his last known business and residence addresses and last known business and residence telephone numbers.

17. Identify who Central Valley has considered to be the official representatives of KYAF since obtaining the construction permit and thereafter.

18. Explain whether KYAF was constructed in compliance with its construction

permit, and if not, explain why it was not.

19. Identify all consultants, contractors, agents or other parties whom Central Valley hired to assist with, provide advice, administer, or complete construction of KYAF, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

20. Explain whether KYAF is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

21. Identify the state in which Central Valley was incorporated and the date on which it was incorporated.

22. Explain whether Mr. Zawila was an owner, officer, or individual who controlled the operations of Central Valley at the time Central Valley filed for a construction permit for KYAF, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

23. Explain whether Mr. Zawila was authorized to act for, or otherwise represent or act as counsel for, Central Valley related to KYAF at the time Central Valley filed for a construction permit for KYAF, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

24. Explain why Mr. Zawila signed the application for a license to cover the construction permit for KYAF.

25. Explain the role and responsibilities of Michael McKenna in connection with Central Valley.

26. Identify all individuals who assisted in the preparation of your responses to the Enforcement Bureau's First Set Of Requests For Production Of Documents to Central Valley


Educational Services, Inc., and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.

27. Identify all individuals who assisted in the preparation of your responses to the Enforcement Bureau's First Set Of Interrogatories To Central Valley Educational Services, Inc., and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.

28. Identify each and every person that Central Valley expects to rely on as a witness and/or for whom Central Valley intends to submit written direct testimony for the hearing. For each and every person identified, state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



Pamela S. Kane
Special Counsel
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, D.C. 20554
(202) 418-1420

Michael Engel
Special Counsel
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C366
Washington, D.C. 20554
(202) 418-7330

July 28, 2015

CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 28th day of July, 2015, sent by first class United States mail copies of the foregoing "ENFORCEMENT BUREAU'S FIRST SET OF INTERROGATORIES TO CENTRAL VALLEY EDUCATIONAL SERVICES, INC." to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554 (by hand, courtesy copy)

Austin Randazzo
Office of the Administrative Law Judge
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
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(by facsimile and first-class mail)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)


Alicia McCannon

Exhibit C

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS, Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX, Avenal, California)	
)	Facility ID No. 9993
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	
)	
Permittee of FM Station KYAF, Firebaugh, California)	
)	Facility ID No. 22030
H. L. CHARLES D/B/A FORD CITY BROADCASTING)	
)	
Permittee of FM Station KZPE, Ford City, California)	
)	Facility ID No. 37725
LINDA WARE D/B/A LINDSAY BROADCASTING)	
)	
Licensee of FM Station KZPO, Lindsay, California)	

To: Avenal Educational Services, Inc.

**ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO AVENAL EDUCATIONAL SERVICES, INC.**

Pursuant to Section 1.325 of the Commission's rules, 47 C.F.R. § 1.325, the Enforcement Bureau (Bureau) hereby requests that Avenal Educational Services, Inc. (Avenal), produce the documents, as defined and specified herein, and deliver the documents to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, D.C. 20554 (or at some other location that is mutually acceptable to the Bureau and Avenal) within ten (10) days of the date of this Request.

DEFINITIONS

For the purposes of this document, the following definition shall apply:

- a. "Avenal" "you" and "your" shall mean Avenal Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing
- b. "William L. Zawila" or "Mr. Zawila" shall mean William L. Zawila.
- c. "Central Valley" shall mean Central Valley Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.
- d. "FCB" shall refer to The Estate of H.L. Charles d/b/a/ Ford City Broadcasting, H.L. Charles d/b/a/ Ford City Broadcasting, any affiliate, d/b/a, including all other persons acting or

purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

e. "Lindsay Broadcasting" shall refer to The Estate of Linda Ware d/b/a Lindsay Broadcasting, Linda Ware d/b/a Lindsay Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

f. "EAS" shall mean Emergency Alert System.

g. "Public Inspection Files" shall mean those files identified in Section 73.3526 of the Commission's Rules.

h. "Rules" means the Commission's regulations found in Title 47 of the Code of Federal Regulations.

i. "KNGS" means radio broadcast station KNGS (FM), Coalinga, California.

j. "KAAX" means radio broadcast station KAAX (FM), Avenal, California.

k. "KYAF" means radio broadcast station formerly known under call sign KAJP (FM), Firebaugh, California."

l. "KZPE" means radio broadcast station KZPE (FM), Ford City, California.

m. "KZPO" means radio broadcast station KZPO (FM), Lindsay, California.

n. "Act" shall mean the Communications Act of 1934, as amended.

o. "Commission" or "FCC" shall mean the Federal Communications Commission.

p. "WTB" shall mean the Wireless Telecommunications Bureau of the Commission.

q. "Audio Division" shall mean the Audio Division of the Commission's Media Bureau.

r. "FCC Form 854" shall mean the FCC Form 854 used to register structures used for wire or radio communication service in any area where radio services are regulated by the Commission; to make changes to existing registered structures or pending applications; or to notify the Commission of the completion of construction or dismantlement of structures, as required by Title 47 of the Code of Federal Regulations, Chapter 1, Part 17 (FCC Rules Part 17) which can be located at <https://transition.fcc.gov/Forms/Form854/854.pdf>.

s. The terms/phrases "referring to," "relating to" and/or "concerning," as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

t. "State" and "describe" mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

u. The terms "identify" and "identification" when used in reference to an individual person mean to state his full name, residence and business telephone numbers, and present residence and business addresses if known, and his present or last known title, position and business affiliation.

v. The terms “identify” and “identification” when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

w. The terms “identify” and “identification” when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

x. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

y. The term “and” also means “or” and the term “or” also means “and.”

z. The term “each” also means “every” and the term “every” also means “each.”

aa. The term “all” also means “any” and the term “any” also means “all.”

bb. The term “identify” when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

cc. The term “document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on

the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including, but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Avenal.

dd. "Discussion" means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. "Discussion" includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ee. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including, but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. Unless otherwise specified, supply all information requested for the period January 1, 1989 through the present.

Documents Requested

1. Documents constituting the complete application for a construction permit for KAAX, including, but not limited to, any applications to modify this application.

2. Documents sufficient to show Avenal obtained a construction permit for KAAX.

3. Documents constituting the complete application for a license to cover the construction permit for KAAX.

4. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction or otherwise concerning construction of the tower (antenna structure) in connection with the permit for KAAX.

5. All documents referring or relating to the construction of the KAAX tower, including, but not limited to, requests to secure engineering services, work orders, contracts, invoices, and purchase orders.
6. Documents sufficient to identify the location(s) of the antenna for KAAX since obtaining the construction permit.
7. All communications between Avenal and Robert F. Turner regarding KAAX, including, but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.
8. Documents sufficient to show that the facilities at KAAX were built as specified in the construction permit.
9. Documents sufficient to show that since obtaining the construction permit for KAAX, KAAX has at all times thereafter maintained a staffed main studio.
10. Documents sufficient to show that the KAAX tower was destroyed by vandalism.
11. Documents constituting any notice or report provided to the Commission concerning the purported vandalism of the KAAX tower.
12. All communications between you and Kunec Engineering and/or Michael G. Kunec regarding KAAX, including, but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.
13. Documents sufficient to show that Kunec Engineering and/or Michael G. Kunec constructed the KAAX tower.
14. All documents constituting your response(s) to a January 25, 2002 letter from the Audio Division concerning KAAX.

15. Documents sufficient to show that since obtaining the construction permit for KAAX, KAAX has at all times thereafter maintained a local telephone number in Avenal, California or a toll-free telephone number.

16. Documents constituting the Public Inspection Files for KAAX.

17. Documents sufficient to show whether Mr. Zawila was an owner, officer, or individual who controlled the operations of Avenal at the time an application for a construction permit was filed for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

18. Documents sufficient to show the owners, officers, or individuals who controlled the operations of Avenal at the time an application for a construction permit was filed for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

19. Documents sufficient to show whether Mr. Zawila was authorized to serve as counsel for, or otherwise represent, Avenal at the time an application for a construction permit was filed for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

20. Documents sufficient to show who was authorized to serve as counsel for, or otherwise represent, Avenal at the time an application for a construction permit was filed for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

21. Documents sufficient to identify the state in which Avenal was incorporated and the date on which it was incorporated, including, but not limited to a certificate of incorporation and any articles of incorporation.

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



Pamela S. Kane
Special Counsel
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, D.C. 20554
(202) 418-1420

Michael Engel
Special Counsel
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C366
Washington, D.C. 20554
(202) 418-7330

July 29, 2015

CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 29th day of July, 2015, sent copies of the foregoing "ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO AVENAL EDUCATIONAL SERVICES, INC." to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

Austin Randazzo
Office of Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804-4833
(714) 636-5040 (telephone)
& (714) 636-5042 (facsimile)
(by facsimile and first-class mail)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)



Alicia McCannon

Exhibit D

**Communications Commission
Washington, D.C. 20554**

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNGS, Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX, Avenal, California)	
)	Facility ID No. 9993
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	
)	
Permittee of FM Station KYAF, Firebaugh, California)	
)	Facility ID No. 22030
H. L. CHARLES D/B/A FORD CITY BROADCASTING)	
)	
Permittee of FM Station KZPE, Ford City, California)	
)	Facility ID No. 37725
LINDA WARE D/B/A LINDSAY BROADCASTING)	
)	
Licensee of FM Station KZPO, Lindsay, California)	

To: Central Valley Educational Services, Inc.

**ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO CENTRAL VALLEY EDUCATIONAL SERVICES, INC.**

Pursuant to Section 1.325 of the Commission's rules, 47 C.F.R. § 1.325, the Enforcement Bureau (Bureau) hereby requests that Central Valley Educational Services, Inc. (Central Valley)

produce the documents, as defined and specified herein, and deliver the documents to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, D.C. 20554 (or at some other location that is mutually acceptable to the Bureau and Central Valley) within ten (10) days of the date of this Request.

DEFINITIONS

For the purposes of this document, the following definition shall apply:

a. "Central Valley" "you" or "your" shall mean Central Valley Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing

b. "Avenal" shall mean Avenal Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

c. "William L. Zawila" and "Mr. Zawila" shall mean William L. Zawila.

d. "FCB" shall refer to The Estate of H.L. Charles d/b/a/ Ford City Broadcasting, H.L. Charles d/b/a/ Ford City Broadcasting any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially

owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

e. "Lindsay Broadcasting" shall refer to The Estate of Linda Ware d/b/a Lindsay Broadcasting, Linda Ware d/b/a Lindsay Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

f. "EAS" shall mean Emergency Alert System.

g. "Public Inspection Files" shall mean those files identified in Section 73.3526 of the Commission's Rules.

h. "Rules" means the Commission's regulations found in Title 47 of the Code of Federal Regulations.

i. "KNGS" means radio broadcast station KNGS (FM), Coalinga, California.

j. "KAAX" means radio broadcast station KAAX (FM), Avenal, California.

k. "KYAF" means radio broadcast station formerly known under call sign KAJF (FM), Firebaugh, California."

l. "KZPE" means radio broadcast station KZPE (FM), Ford City, California.

m. "KZPO" means radio broadcast station KZPO (FM), Lindsay, California.

n. "Act" shall mean the Communications Act of 1934, as amended.

o. "Commission" or "FCC" shall mean the Federal Communications Commission.

p. "WTB" shall mean the Wireless Telecommunications Bureau of the Commission.

q. "Audio Division" shall mean the Audio Division of the Commission's Media Bureau.

r. "FCC Form 854" shall mean the FCC Form 854 used to register structures used for wire or radio communication service in any area where radio services are regulated by the Commission; to make changes to existing registered structures or pending applications; or to notify the Commission of the completion of construction or dismantlement of structures, as required by Title 47 of the Code of Federal Regulations, Chapter 1, Part 17 (FCC Rules Part 17) which can be located at <https://transition.fcc.gov/Forms/Form854/854.pdf>.

s. The terms/phrases "referring to," "relating to" and/or "concerning," as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

t. "State" and "describe" mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

u. The terms "identify" and "identification" when used in reference to an individual person mean to state his full name, residence and business telephone numbers, and present residence and business addresses if known, and his present or last known title, position and business affiliation.

v. The terms “identify” and “identification” when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

w. The terms “identify” and “identification” when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

x. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

y. The term “and” also means “or” and the term “or” also means “and.”

z. The term “each” also means “every” and the term “every” also means “each.”

aa. The term “all” also means “any” and the term “any” also means “all.”

bb. The term “identify” when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

cc. The term “document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on

the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including, but not limited to, any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Central Valley.

dd. "Discussion" means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. "Discussion" includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ee. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including, but not limited to, any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. Unless otherwise specified, supply all information requested for the period January 1, 1988 through the present.

Documents Requested

1. Documents constituting the complete application for a construction permit for KYAF, including, but not limited to, any applications to modify this application.

2. Documents sufficient to show that the Commission granted Central Valley a construction permit for KYAF.

3. Documents constituting the complete application for a license to cover the construction permit for KYAF.

4. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction or otherwise concerning construction of the tower (antenna structure) in connection with the permit for KYAF.

5. All documents referring or relating to the construction of the KYAF tower, including, but not limited to, requests to secure engineering services, work orders, contracts, invoices, and purchase orders.

6. Documents sufficient to identify the location(s) of the antenna for KYAF since obtaining the construction permit.

7. All communications between you and Robert F. Turner regarding KYAF, including, but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.

8. Documents sufficient to show that the facilities at KYAF were built as specified in the construction permit.

9. Documents sufficient to show that since obtaining the construction permit for KYAF, KYAF has at all times thereafter maintained a staffed main studio.

10. All communications between you and Kunec Engineering and/or Michael G. Kunec regarding KYAF, including, but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.

11. Documents sufficient to show that Kunec Engineering and/or Michael G. Kunec constructed the KYAF tower.

12. All documents constituting your response(s) to a January 25, 2002 letter from the Audio Division concerning KYAF.

13. Documents sufficient to show that since obtaining the construction permit for KYAF, KYAF has at all times thereafter maintained a local telephone number in Firebaugh, California or a toll-free telephone number.

14. Documents constituting the Public Inspection Files for KYAF.

15. Documents sufficient to show whether Mr. Zawila was an owner, officer, or individual who controlled the operations of Central Valley at the time an application for a construction permit for KYAF was filed, during the time periods referenced in the HDO, and at all times thereafter.

16. Documents sufficient to show the owners, officers, or individuals who controlled the operations of Central Valley at the time an application for a construction permit for KYAF was filed, during the time periods referenced in the HDO, and at all times thereafter.

17. Documents sufficient to show whether Mr. Zawila was authorized to serve as counsel for, or otherwise represent, Central Valley at the time an application for a construction permit for KYAF was filed, during the time periods referenced in the HDO, and at all times thereafter.

18. Documents sufficient to show who was authorized to serve as counsel for, or otherwise represent, Central Valley at the time an application for a construction permit for KYAF was filed, during the time periods referenced in the HDO, and at all times thereafter.

19. Documents sufficient to identify the state in which Central Valley was incorporated and the date on which it was incorporated, including, but not limited to, a certificate of incorporation and any articles of incorporation.

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



Pamela S. Kane
Special Counsel
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, D.C. 20554
(202) 418-1420

Michael Engel
Special Counsel
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C366
Washington, D.C. 20554
(202) 418-7330

July 29, 2015

CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 29th day of July, 2015, sent copies of the foregoing "ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO CENTRAL VALLEY EDUCATIONAL SERVICES, INC." to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

Austin Randazzo
Office of Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804-4833
(714) 636-5040 (telephone)
& (714) 636-5042 (facsimile)
(by facsimile and first-class mail)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)


Alicia McCannon

Exhibit E

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS)	
Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICE, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX,)	
Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL)	Facility ID No. 9993
SERVICES, INC.)	
)	
Permittee of FM Station KYAF,)	
Firebaugh, California)	
)	
R. L. CHARLES d/b/a FORD CITY)	Facility ID No. 22030
BROADCASTING)	
)	
Permittee of FM Station KZPE,)	
Ford City, California)	
)	
LINDA WARE d/b/a LINDSAY)	Facility ID No. 37725
BROADCASTING)	
)	
Licensee of FM Station KZPO,)	
Lindsay, California)	

To: Enforcement Bureau, FCC

JOINT RESPONSE TO ENFORCEMENT BUREAU'S FIRST SET
OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO AVENAL
EDUCATIONAL SERVICES, INC. AND CENTRAL VALLEY
EDUCATIONAL SERVICES, INC.

Avenal Educational Services, Inc. (hereinafter "AES") and
Central Valley Educational Services, Inc. (hereinafter "CVES")
hereby jointly respond to the Enforcement Bureau's first set of
requests for production of documents directed to AES and CVES

as follows:

OBJECTION -

AES and CVES hereby each object to the enforcement bureau's first set of requests for production of documents in their entirety on the following grounds.

The enforcement bureau has directed a first set of requests for production of documents to AES and CVES. However, the enforcement bureau has sent these requests to attorney William L. Zawila who represents two groups of clients claiming to be AES and CVES and to competing and conflicting attorney Michael Couzens who represents two other groups of clients claiming also to be AES and CVES.

Clearly, the two competing and conflicting attorneys with their competing and conflicting groups of clients cannot both be the party in interest in this proceeding known as AES and the party in interest in this proceeding known as CVES.

The two sets of requests for production of documents directed by the enforcement bureau to both of the competing and conflicting attorneys noted above are vague, ambiguous, and unintelligible.

These two sets of requests do not reveal on their face which attorney and group of clients is expected to be the responding parties and which attorney and group of clients is merely receiving an informational copy of these two requests.

Clearly, the enforcement bureau cannot realistically consider both competing and conflicting attorneys and their respective clients to be the AES and CVES real parties in interest at the same time.

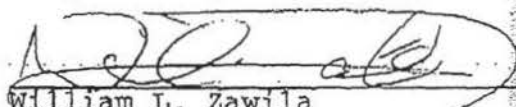
The enforcement bureau has been aware of this situation for a considerable period of time and has chosen to ignore it.

The said sets of requests also seek irrelevant information not calculated to lead to the discovery of admissible evidence.

The said requests are also burdensome, oppressive, and cause unnecessary expense.

The said requests also violate the requirements of FCC Rule §1.325 which require such requests to be directed to a party in a proceeding. In this case, it is impossible to determine which attorney and which group of clients is considered by the enforcement bureau to be the true parties in interest in this proceeding.

Respectfully submitted,



William L. Zawila
Attorney For Avenal Educational
Services, Inc. and Central Valley
Educational Services, Inc.
12600 Brookhurst Street - #105
Garden Grove, CA 92840
(714) 636-5040-Telephone
(714) 636-5042-FAX

8-11-15

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Joint Response to Enforcement Bureau's 1st Set of Requests for Production of Documents to AES and CVES was served on the following by U.S. First Class Mail, postage prepaid, on 8-11-15:

Pamela S. Kane, Esquire
Investigations and Hearings Division
Enforcement Bureau
FCC
445 12th Street, S.W. - Room 4-C366
Washington, D.C. 20554

Michael Couzens
6536 Telegraph Avenue - Suite B201
Oakland, CA 94609



William Zawila

Exhibit F

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS)	
Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICE, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX,)	
Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL)	Facility ID No. 9993
SERVICES, INC.)	
)	
Permittee of FM Station KYAF,)	
Firebaugh, California)	
)	
H. L. CHARLES d/b/a FORD CITY)	Facility ID No. 22030
BROADCASTING)	
)	
Permittee of FM Station KZPE,)	
Ford City, California)	
)	
LINDA WARE d/b/a LINDSAY)	Facility ID No. 37725
BROADCASTING)	
)	
Licensee of FM Station KZPO,)	
Lindsay, California)	

To: Marlene H. Dortch, Secretary
Attn: Chief Administrative Law Judge
Richard L. Sippel

JOINT RESPONSE TO ENFORCEMENT BUREAU'S FIRST SET
OF INTERROGATORIES TO AVENAL EDUCATIONAL SERVICES,
INC. AND CENTRAL VALLEY EDUCATIONAL, SERVICES, INC.

Avenal Educational Services, Inc. (hereinafter "AES") and
Central Valley Educational Services, Inc. (hereinafter "CVES")

hereby jointly respond to the Enforcement Bureau's first set of interrogatories directed to AES and CVES as follows:

OBJECTION -

AES and CVES hereby each object to the enforcement bureau's first set of interrogatories in their entirety on the following grounds.

The enforcement bureau has directed a first set of interrogatories to AES and CVES. However, the enforcement bureau has sent these interrogatories to attorney William L. Zawila who represents two groups of clients claiming to be AES and CVES and to competing and conflicting attorney Michael Couzens who represents two other groups of clients claiming to be AES and CVES.

Clearly, the two competing and conflicting attorneys with their competing and conflicting groups of clients cannot both be the parties in interest in this proceeding known as AES and CVES.

The two sets of interrogatories do not reveal on their face which attorney and group of clients is expected to be the responding parties and which attorney and group of clients is merely receiving an informational copy of these two sets of interrogatories.

Clearly, the enforcement bureau cannot realistically consider both competing and conflicting attorneys and their respective clients to be the AES and CVES real parties in interest at the same time.

The two sets of interrogatories directed to both of the competing and conflicting attorneys noted above are vague, ambiguous, and unintelligible.

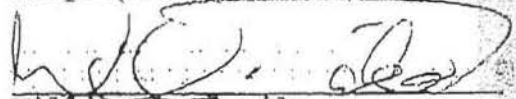
The enforcement bureau has been aware of this situation for a considerable period of time and has chosen to ignore it.

The said interrogatories also seek information which is irrelevant and not calculated to lead to the discovery of admissible evidence.

The said interrogatories are also burdensome, oppressive, and cause unnecessary expense.

The said interrogatories also violate the requirements of PCC Rule §1.323 which require that such interrogatories be directed to a party in a proceeding. In this case, it is impossible to determine which attorney and which group of clients is considered by the enforcement bureau to be the true parties in interest in this proceeding.

Respectfully submitted,



William L. Zawila
Attorney For Avenal Educational
Services, Inc. and Central Valley
Educational Services, Inc.
12600 Brookhurst Street - #105
Garden Grove, CA 92840
(714) 636-5040-Telephone
(714) 636-5042-FAX

8-14-15

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Joint Response to Enforcement Bureau's 1st Set of Interrogatories to Avenal Educational Services, Inc. and Central Valley Educational Services, Inc. was served on the following by U.S. First Class Mail, postage prepaid, on 8-14-15:

Chief Administrative Law Judge

Richard L. Sippel

FCC

445 12th Street, S.W. - Room 1-C768

Washington, D.C. 20554

Pamela S. Kane, Esquire

Investigations and Hearings Division

Enforcement Bureau

FCC

445 12th Street, S.W. - Room 4-C366

Washington, D.C. 20554

Michael Couzens

6536 Telegraph Avenue - Suite B201

Oakland, CA 94609



William Zawila

Exhibit G

Before the
Federal Communications Commission
Washington, DC 20554

Received & Inspected
AUG 17 2015
FCC Mail Room

In the Matter of

EB Docket No. 03-152

WILLIAM L. ZAWILA

Facility ID No. 72672

Permittee of FM Station JBGS,
Coalinga, California

AVENAL EDUCATIONAL SERVICE, INC.

Facility ID No. 3365

Permittee of FM Station KAAX,
Avenal, California

**CENTRAL VALLEY EDUCATIONAL
SERVICES, INC.**

Facility ID No. 9993

Permittee of FM Station KYAF,
Firebaugh, California

**H. L. CHARLES d/b/a FORD CITY
BROADCASTING**

Facility ID No. 22030

Permittee of FM Station KZPE,
Ford City, California

**LINDA WARE d/b/a LINDSAY
BROADCASTING**

Facility ID No. 37725

Licensee of FM Station KZPO,
Lindsay, California

**WESTERN PACIFIC
BROADCASTING, INC.**

File BR-19970804YJ
Facility ID No. 71836

For Renewal of License for AM
Station KKFO, Coalinga, CA

TO: Chief of the Enforcement Bureau

GENERAL OBJECTION TO REQUESTS FOR PRODUCTION OF DOCUMENTS

Central Valley Educational Services, Inc. (CVES) and Avenal Educational Services, Inc.,

(AES) by their attorney here note their general objection to the Enforcement Bureau's First Request for Production of Documents, as to each responding party, served by mail on July 29, 2015.

(1) Inasmuch as no distinction is made as between the undersigned counsel and William Zawila, Esq., it is unclear who is charged with the duty of responding to these demands. We will assume for purposes of this objection that the requests are directed solely at Mr. Zawila, who claims to represent both of these entities. We will not be responding separately.

(2) Because party or apparent agency information in the definitions (a) through (e) are not delimited in time, the definitions are overbroad, and so vague as to be meaningless.

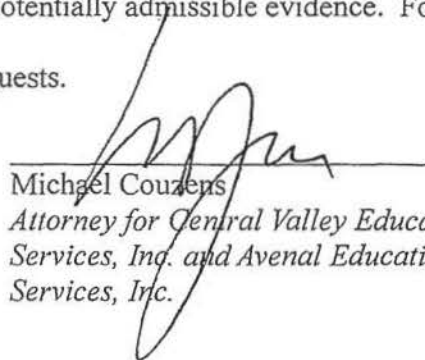
(3) The Hearing Designation Order herein was released on July 16, 2003. Any events past that date are beyond the scope of the designated issues. The request, Instructions (c), encompassing the period January 1, 1989 "through the present" embraces huge swaths of time where documents and events are immaterial, and so is vague, ambiguous, and over broad.

(4) Parties seeking Commission records are not permitted to proceed by document demand, Sec. 1.325(b) of the Rules. Requests 1 through 4 appear to consist entirely of Commission records, and numerous other requests are over broad, taking no steps by their terms to exclude such records.

(5) On July 28 the undersigned sent an e-mail to the demanding party, pointing out that the pending enlargement motion, if granted, could result in the termination of their authorizations – negating their entire reason for being in this hearing. We requested, as a courtesy, that the time for answer be tolled until after the motion is decided. "These parties will need to decide how and whether they wish to proceed, especially if the motion is granted. Equitably they should not have to incur the expense of the full response without knowing." Enforcement Bureau counsel rejected this request and agreed to toll the responses only to a select number of items, purportedly anchored to the subject matter of the enlargement motion (and as

such probably not material anyway). This response was wholly unreasonable and un-collegial. Unfortunately, it suggests that the primary purposes of these interrogatories were malice, oppression and surprise, rather than the search for potentially admissible evidence. For this reason as well, we will not be responding to the requests.

Dated: August 11, 2015



Michael Couzens
*Attorney for Central Valley Educational
Services, Inc. and Avenal Educational
Services, Inc.*

Michael Couzens, Attorney at Law
6536 Telegraph Avenue, Suite B201
Oakland, CA 94609
Telephone (510) 658-7654
Fax (510) 654-6741
E-mail: cuz@well.com

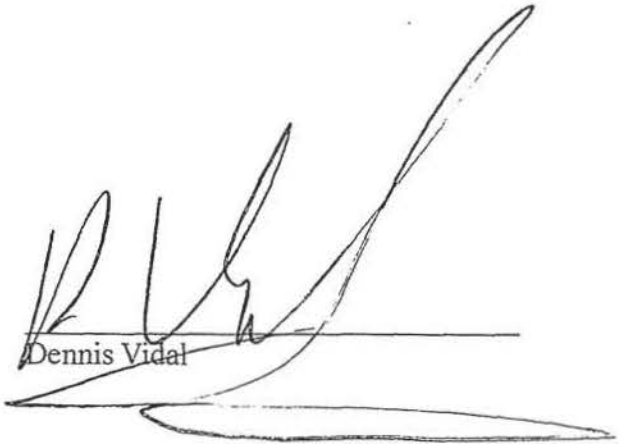
CERTIFICATE OF SERVICE

I, Dennis Vidal, do hereby certify that on this 11th day of August, 2015, I sent copies of the foregoing document "GENERAL OBJECTION TO REQUESTS FOR PRODUCTION OF DOCUMENTS" by First Class Mail, with postage prepaid, to the following:

Pamela S. Kane
Special Counsel
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street Southwest, Room 4-C366
Washington, D.C. 20554

William L. Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804

August 11, 2015



Dennis Vidal

Exhibit H

Pamela Kane

From: Michael Couzens <cuз@well.com>
Sent: Tuesday, July 28, 2015 6:48 PM
To: Pamela Kane
Cc: Michael Engel; Patricia Ducksworth
Subject: Re: 7 28 15 Zawila EB Docket No. 03-152

With respect to the discovery served by mail on Avenal and Educational today, as a courtesy, I request your consent to toll the response time while your enlargement motion is pending. The time for response then would be counted from the date that the ruling is adopted.

These parties will need to decide how, and whether they wish to proceed, especially if the motion is granted. Equitably they should not have to incur the expense of the full responses without knowing.

So let me know. Thank you.

Michael Couzens
Attorney at Law
6536 Telegraph Avenue, Suite B201
Oakland, CA 94609

Tel. (510) 658-7654
Fax (510) 654-6741
cuз@well.com

On Jul 28, 2015, at 1:24 PM, Pamela Kane wrote:

<1st Set Interrogatories Zawila 7-28-15.pdf>

Exhibit I

Pamela Kane

From: Pamela Kane
Sent: Wednesday, July 29, 2015 9:34 AM
To: Michael Couzens
Cc: Michael Engel
Subject: RE: 7 28 15 Zawila EB Docket No. 03-152

Mr. Couzens:

With regard to the request to toll Avenal and Central Valley's responses to the Bureau's first set of interrogatories on the basis of the pending Motion to Add Issues until that Motion is ruled on, the Bureau will agree to toll Avenal and Central Valley's obligation to provide responses to a limited number of interrogatories as they arguably seek discovery concerning the two issues the Bureau has requested be added to the proceeding.

Central Valley: The Bureau agrees to toll Central Valley's obligation to respond to only Interrogatory Nos. 21-24 until 14 days after the Presiding Judge rules on the Bureau's Motion to Add Issues.

Avenal: The Bureau agrees to toll Avenal's obligation to respond to only Interrogatory Nos. 32, 36, 37, 39-41 and 46 until 14 days after the Presiding Judge rules on the Bureau's Motion to Add Issues.

With regard to the remaining interrogatories, it is the Bureau's position that there is no basis to toll Avenal and Central Valley's obligations to provide responses in accordance with Section 1.323(b) of the Commission's rules. Pursuant to the Hearing Designation Order, Avenal and Central Valley are parties to this proceeding and as such have obligations pursuant to the Commission's rules. The remaining interrogatories seek discovery relevant to the issues already set out in the Hearing Designation Order.

In addition, we note that Ms. Ducksworth is an employee with the Office of the Administrative Law Judge. In copying her on your request, we alert you that you have engaged in an *ex parte* communication.

Pamela S. Kane
Special Counsel -- Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
202-418-2393

From: Michael Couzens [mailto:cuz@well.com]
Sent: Tuesday, July 28, 2015 6:48 PM
To: Pamela Kane <Pamela.Kane@fcc.gov>
Cc: Michael Engel <Michael.Engel@fcc.gov>; Patricia Ducksworth <Patricia.Ducksworth@fcc.gov>
Subject: Re: 7 28 15 Zawila EB Docket No. 03-152

With respect to the discovery served by mail on Avenal and Educational today, as a courtesy, I request your consent to toll the response time while your enlargement motion is pending. The time for response then would be counted from the date that the ruling is adopted.

These parties will need to decide how, and whether they wish to proceed, especially if the motion is granted. Equitably they should not have to incur the expense of the full responses without knowing.

So let me know. Thank you.

Michael Couzens
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On Jul 28, 2015, at 1:24 PM, Pamela Kane wrote:

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